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Wells Fargo Bank, N.A.

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION**

In re

LAUREN J. MASSA-LOCHRIDGE,  
  
Debtor.

Case No. 18-42193-RLE

Chapter 13

R.S. No. AKL - 040

**MOTION FOR IN REM RELIEF  
FROM AUTOMATIC STAY AND CO-  
DEBTOR STAY**

**Hearing:**

Date: November 28, 2018

Time: 1:30 p.m.

Place: 1300 Clay Street,  
Courtroom 201  
Oakland, CA 94612

Wells Fargo Bank, N.A. ("Movant or Creditor")<sup>1</sup> will and hereby does move, pursuant to 11 U.S.C. §§ 362(d) and 1301, and Rule 4001 of the Federal Rules of Bankruptcy Procedure, for an order terminating the automatic stay of 11 U.S.C. § 362(a) and co-debtor stay of 11 U.S.C. §

<sup>1</sup> This Motion for Relief from Automatic Stay shall not constitute a waiver of the within party's right to receive service pursuant to Fed. R. Civ. P. 4, made applicable to this proceeding by Fed. R. Bankr. P. 7004, notwithstanding Aldridge Pite, LLP's participation in this proceeding. Moreover, the within party does not authorize Aldridge Pite, LLP, either expressly or impliedly through Aldridge Pite, LLP's participation in this proceeding, to act as its agent for purposes of service under Fed. R. Bankr. P. 7004.


1 1301(a) they apply to Movant and the real property located at 1601 Beverly Place, Berkeley,  
2 California 94707 ("Property").

3 Debtor(s) executed a promissory note secured by a mortgage or deed of trust. The  
4 promissory note is either made payable to Creditor or has been duly indorsed. Creditor, directly  
5 or through an agent, has possession of the promissory note. Creditor is the original mortgagee or  
6 beneficiary or the assignee of the mortgage or deed of trust.

7 This Motion is based on the Notice of Motion for Relief from Automatic Stay,  
8 Memorandum of Points and Authorities in Support of Motion for Relief from Automatic Stay,  
9 and Declaration in Support of Motion for Relief from Automatic Stay filed concurrently  
10 herewith, the pleadings and papers on file herein, and upon such oral and documentary evidence  
11 as may be presented by the parties at the hearing.

12 ALDRIDGE PITE, LLP

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14 Dated: October 29, 2018

  
15 ALEXANDER K. LEE  
16 Attorneys for Movant Wells Fargo Bank, N.A.  
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